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March 31, 2023

Hon. P. Kevin Castel
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Juan Orlando Hernandez, 15 Cr. 379 (PKC)
(Objection to the government's requested CIPA Protective Order)

Dear Judge Castel,

Mr. Juan Orlando Hernandez writes to note his objection to the government's proposed protective order governing the production of classified discovery in this case. Mr. Orlando Hernandez notes his objection to the government withholding any Rule 16 discovery (classified or otherwise) from his review. He further objects to specific sections of the Protective Order. His objections are noted and redlined for the Court's convenience.¹

The government has declined to accept Mr. Hernandez's modifications, and we now seek relief from the Court.

We thank the Court for its time and consideration of our position.

Respectfully submitted,

/s/Sabrina P. Shroff
Raymond Colon
Counsel for Juan Orlando Hernandez Alvarado

cc: CISO Mulberry & Hartenstine

¹ For the Court's convenience I have attached a word version of the proposed protective order. Mr. Hernandez's proposed changes appear in redline.